## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

Andrew AARON, et al,

Plaintiffs,

v.

Case No. 20-CV-01660

Dominick RATKOWSKI and Joseph ROY,

Defendants.

## PLAINTIFFS' OBJECTIONS TO DEFENDANTS' SUPPLEMENTAL EXHIBIT LIST (ECF #377)

Plaintiffs, by and through their undersigned Counsel, object to the Supplemental Exhibit List (ECF #377) numbers 1000, and including 1012 through 1015, and 1017-1018, on the following grounds:

<u>Item 1000</u>: "Ratkowski List Redacted to include only named-parties with claims"

Plaintiffs object as this Exhibit is moot, and additionally is not authentic.

<u>Item 1012</u>: "4/20/2022 Public Filing with the Clerk of Circuit Court in Case No. 2022CV000037, ECF 14 (email exhibit including the Roy Link)"

Plaintiffs object as to relevance, and failure to disclose. The case referenced is not about any plaintiff on this case, and though Defendants have characterized this item as in the public domain, it is only the circuit court case number and events that are in the public domain, not any filings inside of the matter.

<u>Item 1013</u>: "08/27/2021 Article in Wisconsin Examiner - "Police "target list' of Protestors Shared Among Law Enforcement Agengies [sic] (Publically Avalible)[sic]"

Plaintiffs object as to relevance and hearsay.

Item 1014: "8/8/20 Protest at Mensah's residence used by Ratkowski for identification

(Ratkowski 6/22/21 Disclosure (flash drive) social media posts)"

Plaintiffs object as Defendants fail to disclose with specificity the video they intend

to use. Plaintiffs received four (4) separate videos matching Defendants' Exhibit List

description entry for that date. The four videos are in duration of 1.16 minutes, 1.55

minutes, .08 minutes and .27 minutes. Defendants fail to disclose which video they seek

to use.

**Item 1015:** "Video from 7/7/20 Protest at Cheese Cake Factory taken by Andrea Tripplet

used by Ratkowski for identification (Ratkowski 6/22/21 Disclosure (flash drive)"

Plaintiffs object as Defendants failed to disclose any video by "Andrea Tripplet" at

any time.

Items 1017 and 1018: Amended Complaints previously filed in this case (ECF #47, and

ECF #54-1)

CONCLUSION

For the reasons set forth above, and in the interest of fairness, justice and efficiency, this

Honorable Court should strike the foregoing Exhibits from Defendants' proposed exhibit list, ECF

#377.

Respectfully submitted this 27th day of April, 2023.

**COUNSEL FOR PLAINTIFFS** 

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